

The San Francisco Bay Area Independent Media Center (Indybay) published an article on their website titled “Wood Pellet Plant in Mendocino County Threatens Public Health” on April 9, 2020 by Bradley Allen.

Mendocino Forest Products found a number of comments that would benefit from additional correction, clarification or commentary which are presented on the right side of the page in green italics.

Substantial factual information on Mendocino and Humboldt Redwood forests and its practices are available at www.MendoCo.com. Wherever possible we have provided direct links to specific material on our website to help the readers have easy access.

<p>Text of Press Release <i>Text of article begins below, spaces placed to allow facts to line up with text of article.</i></p>	<p><i>Facts from Mendocino Forest Products</i></p>
<p>[BEGINNING OF ARTICLE]</p> <p>On April 3, community activists from Mendocino County were interviewed on KPFA’s Terra Verde radio program. Host Gary Hughes spoke with Polly Girvin and Maria Gilardin about the threats posed by a wood pellet processing facility in Calpella, which is located on the Russian River six miles north of Ukiah.</p> <p>Polly and Maria are members of Social, Environmental and Indigenous Justice (SEIJ), an affinity group waging a campaign to protect rural and indigenous communities from pollution emitted by Mendocino Forest Products (MFP) and their wood pellet fuel plant. According to the MFP website, “CalPellets™ fuel pellet products are produced out of a fir-redwood blend.”</p> <p>While speaking on the Terra Verde program, Polly Girvin described some of the many concerns community members have with the Calpella Distribution Center operated by Mendocino Forest Products:</p> <p>“I live on the Coyote Valley Reservation and take a road down to the freeway. And at first there was a little pipe belching up some smoke sometimes. A little bit of wood chips underneath this tented area, and it went on like that for a while.</p> <p>[ARTICLE CONTINUES]</p>	<p>The plume that emits from the pellet facility is water vapor that has been found to be in compliance with allowable emissions limits at full production.</p>

“Then all the sudden there was this exponential boom. There were mountains of plastic bags filled with wood pellets. It was going night and day this smokestack, belching out huge clouds. One time I noticed it was very rancid and it stank, and it was going down the valley towards Ukiah.

“Going south from the plant are two schools, a residential neighborhood of low to moderate income mostly Hispanic people, one block away a tribal health clinic that services ten tribes, and a little bit up the road is the Coyote Valley Reservation.”

Mendocino Forest Products, Mendocino Redwood Company, and Humboldt Redwood Company are owned by Sansome Partners, a San Francisco-based investment firm with offices in Seattle and Boston. The Fisher Family of San Francisco is the primary investor in Sansome Partners.

For more information on the global impacts of the wood pellet industry, check out the documents at the end of this article:

Clear Cut Fact Sheet

Clear Cut: Wood Pellet Production, the Destruction of Forests, and the Case for Environmental Justice
Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act

For more information from SEIJ on the MFP Calpella facility, see their press release posted below:

Date: December 6, 2019

For immediate and continuous release

From: Social Environmental and Indigenous Justice (SEIJ)

Re: Urgent need for public to be informed by the County and the Air Quality Management District as to the ongoing and uncorrected hazardous pollution being emitted from the Mendocino Forest Product's Wood Pellet Production Plant in Calpella, CA located close to two elementary schools and Indian Health clinic and the Coyote Valley reservation.

[ARTICLE CONTINUES]

Since MRC's inception in 1998, clearcutting was eliminated as method to manage our forests. To find additional information on how we manage our forest, please visit www.MendoCo.com. It should also be noted logs delivered to the sawmill in Ukiah are used to create lumber. A portion of the waste from this process (sawdust, chips) is used to make wood pellets.

Mendocino Forest Products (MFP) obtained an Authority To Construct permit from the local Air Quality Management District (AQMD) to construct the pellet facility. After construction, during normal tuning and testing, there were difficulties meeting the emission limits of the permit so the facility voluntarily reduced production to always remain below allowable emission limits . MFP and AQMD agreed to this while MFP invested in additional control technology and demonstrated the ability to operate consistently below allowable limits. This has been completed. Tests reveal that allowable emissions limits are now being met at full production. An additional Authority to Construct permit will be issued shortly to install equipment (a hammer mill) which

<p>Contact person: Polly Girvin 707 485-2604</p> <p>From the press release accompanying the opening of the Mendocino Forest Product's (MFP) wood pellet production plant in Calpella the company owners stated:</p> <p>"The plant will produce between 1.5 million and 1.75 million 40 pound bags of pellets each year (30,000 to 35,000 tons annually).</p> <p>In the past year huge piles of small logs at the Mendocino Redwood Company's log deck on North State Street were chipped into sawdust and transported for use at the Mendocino Forest Product's wood pellet production plant and a huge plume of smoke has been emitted from the plant on nearly a daily basis. Since this plant is close to an elementary school and a health clinic to which tribal members from 10 tribes with compromised health issues attend, it is urgent for the public to pursue inquiries with the Air Quality Management District regarding the pollutant levels being emitted from the plant.</p> <p>Polly Girvin, a SEIJ member, has spoken with the Director of the Air Quality Management District on the phone and at one office visit and found that:</p> <p>The MRC plant has been found three times to be in violation of the operation permit it was issued by the Air Quality Management District due to impermissible levels of particulate matter pollution spewing from the plant's smokestack, and recently MRC was once again found to be emitting impermissible levels of pollutants. All attempts to date to sufficiently lower pollution emanating from the plant to permissible levels have failed.</p> <p>[ARTICLE CONTINUES]</p>	<p>provides consistent feedstock, thereby further ensuring compliance with AQMD standards.</p> <p>All logs at the deck on North State Street are milled for lumber at the sawmill at the same location. Mill residuals such as sawdust are then shipped to the pellet facility to create pellets.</p> <p>The plume that emits from the pellet facility is water vapor that has been found to be in compliance with allowable emissions limits at full production.</p> <p>The plume that emits from the pellet facility is water vapor that has been found to be in compliance with allowable emissions limits at full production. After construction, during normal tuning and testing, there were difficulties meeting the emission limits of the permit so the facility voluntarily reduced production to always remain below allowable emission limits . MFP and AQMD agreed to this while MFP invested in additional control technology and demonstrated the ability to operate consistently below allowable limits. This has been completed. Tests reveal that allowable emissions limits are now being met at full production. An additional Authority to Construct permit will be issued shortly to install equipment (a hammer mill) which provides consistent feedstock, thereby further ensuring compliance with AQMD standards.</p>
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- The first violation of the permit was not found to be sufficiently corrected after the installation of a hammermill.
- A second violation occurred and as a mitigation measure MRC was made to install "monitoring technology" by the elementary school. Not sure if this monitoring device is by the Calpella Elementary School or the Waldorf School
- At one point the uncorrected pollution levels were so grave that the plant had to reduce its production rate in order to comply with Particulate Matter emission rate limits specified in the permit issued for the plant by the Air Quality Management District.
- A third violation occurred recently and the report regarding this violation was "under review" when Ms. Girvin spoke with the Air Quality Management District Director.

The Air Quality Management District Director informed Ms. Girvin that to address the third permit violation MFP is now being required to install software technology in an attempt to make more uniform the size of pellets being burned. Non uniformity of particulate matter increases pollution emission.

Research results pertaining to the toxicity of wood pellet plant emission are as follows:

Environmental Impacts

Pellet production facilities release dangerous air pollutants including particulate matter and volatile organic compounds putting surrounding communities at higher risk for health complications.

[ARTICLE CONTINUES]

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The monitoring technology was installed near the Calpella Elementary School by the AQMD and is monitored by them.

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The source of the research quoted here comes from a document prepared by the Rachel Carson Council, a national environmental organization, titled "*Clear Cut: Wood Pellet Production, the Destruction of Forests, and the Case for Environmental Justice*". This paper focuses on pellet manufacturing in South Carolina. Emissions standards are significantly more stringent in California. It is important to note the forests in Mendocino County are sustainably managed for lumber production. Only the waste material from the milling process is used to create pellets.

<p>"EIP's survey reveals that these facilities emit dangerous amounts of air pollution and further finds that state agencies consistently fall well short of their duty to ensure that these facilities control their pollution to the levels required by law, frequently due to misleading information supplied by the industry.</p> <p>Main source of information "is the drying process, as burning wood emits substantial amounts of fine particulate matter, carbon monoxide, nitrogen oxides and greenhouse gases".</p> <p>Health Impacts</p> <p>"When wood pellets are first processed or chipped in mills, they release heavy amounts of carbon dioxide and harmful pollutants."</p> <p>"The processing and burning of wood pellets creates Volatile Compounds (VOC's), particulate matter (PM), nitrogen oxide (NO) and carbon monoxide, all of which are detrimental to health".</p> <p>MOST IMPORTANTLY FOR CHILDREN ATTENDING TWO ELEMENTARY SCHOOLS VERY CLOSE TO THE PLANT</p> <p>"Risk from air-borne pollutants which can cause or worsen cardiovascular and respiratory issues and cancers. Long term exposure too many of these pollutants especially acetaldehyde and methanol can also cause chronic symptoms and harm early childhood development.</p> <p>[ARTICLE CONTINUES]</p>	<p>The Environmental Integrity Project (EIP) produced a document in 2018 titled <i>"Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act"</i>, from which this language has been quoted. This document looked at a number of facilities in the US South only. Emissions standards are significantly more stringent in California. It is important to note the forests in Mendocino County are sustainably managed for lumber production. Only the waste material from the milling process is used to create pellets.</p> <p>The source of the research quoted here comes from a document prepared by the Rachel Carson Council, a national environmental organization, titled <i>"Clear Cut: Wood Pellet Production, the Destruction of Forests, and the Case for Environmental Justice"</i>. This paper focuses on pellet manufacturing in South Carolina. It is important to note the forests in Mendocino County are sustainably managed for lumber production. Only the waste material from the milling process is used to create pellets. Emissions standards are significantly more stringent in California.</p> <p>A Source Test Report submitted to AQMD shows compliance with all emissions limits at full production.</p> <p>The source of the research quoted here comes from a document prepared by the Rachel Carson Council, a national environmental organization, titled <i>"Clear Cut: Wood Pellet Production, the Destruction of Forests, and the Case for Environmental Justice"</i>. This paper focuses on pellet manufacturing in South Carolina. Emissions standards are significantly more stringent in California. The pellet plant does not emit acetaldehyde or methanol.</p>
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"Multiple lines of evidence suggest that short-term exposure to elevated levels of biomass combustion products could increase the risk of respiratory health issues. PM2.5 consists of airborne particles less than 2.5 micrometers which can pass deep into a person's lungs and even into the bloodstream, causing heart attacks, decreased lung function, worsening asthma symptoms, and premature death. Many wood pellet mills frequently emit 60 to 80 tons per year of PM2.5 even after installing controls.

Breathing ozone created by wood pellet facilities "can trigger a variety of health problems, particularly to children, the elderly and people of all ages who have lung diseases such as asthma".

SEIJ urges the Mendocino County Community and the recently appointed Mendocino County Climate Change Advisory Council to join us in investigating Mendocino Forest Product's wood pellet plant's particulate matter pollution levels that have to date found to be outside of the boundaries set forth in the permit issued for the facility. Of further concern, Supervisor McGowan in referencing the permit issued for the company indicated the plant is in an area zoned as industrial. This zoning designation should not allow for higher levels of pollution to be emitted from the plant given the proximity of two schools, an Indian Health Clinic and a Tribe.

Attached are scientific research papers which can be referenced for a more detailed discussion of the harmful health and environmental impacts of pollution emitted from wood pellet production plants.

[END OF ARTICLE]

The Environmental Integrity Project (EIP) produced a document in 2018 titled *"Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act"*, from which this language has been quoted. This document looked at a number of very large facilities in the US South only. Emissions standards are significantly more stringent in California. MFP's permit with AQMD requires a maximum PM^{2.5} emission rate of 4.8 tons per year. MFP is currently operating at 2 tons per year, compared to the 60 to 80 tons per year quoted in this document.

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